


APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J.

Dated: August 28, 2024

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Hon. Vernon S. Broderick
40 Foley Square
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August 27, 2024

Re: *Tang et al v. United States of America*, No. 1:23-cv-09885 (VSB)

We represent Plaintiffs Tony Tang and Gilberto Torres Gomez as well as the proposed class in the above-captioned action. On July 3, 2024, Defendant USCIS filed a motion to dismiss the Complaint under Rule 12(b)(1) and for judgment on the pleadings under Rule 12(c). *See* Dkt. 43. Plaintiffs' opposition to the motion is currently due to be filed by August 29. *See* Dkt. 50.

Plaintiffs write to request a one-week extension of the deadline by which to file their opposition to USCIS's pending motion, such that their opposition would instead be due September 5, 2024. This extension is needed because one of Plaintiffs' counsel recently departed for earlier-than-anticipated parental leave, and other members of the team have been limited in their ability to shift their schedules in light of an upcoming trial and other pre-existing commitments. This is Plaintiffs' second such extension request, and USCIS has consented to this request.

We thank the Court for its continued attention to this matter.

Respectfully submitted,

/s/ Geng Chen

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